

Exhibit "D"

20-022C 1:20-cv-2842

DECLARATION OF STEPHEN MOODY

STEPHEN MOODY, hereby declares under the penalty of law that the following is true and correct:

1. I am over 18 years of age and reside in Westminster, CO. I am making this declaration under my own free will.

2. I understand that Fallen Productions Inc. has evidence that I logged onto the website YTS using the email address s[REDACTED]@hotmail.com to download a torrent file of the motion picture *Angel Has Fallen* on 11/25/2019 17:22 UTC from Internet Protocol ("IP") 73.153.233.238 of [REDACTED] Cable.

3. I understand that Fallen Productions, Inc. has evidence that I shared copies of its motion picture *Angel Has Fallen* by the file name "Angel Has Fallen (2019) [BluRay] [720p] [YTS.LT]" from the IP address 73.153.233.238 of [REDACTED] on 11/25/2019 via a BitTorrent Client.

4. I also understand that Hunter Killer Productions, Inc. has evidence that I shared copies of its motion picture *Hunter Killer* by the file name "Hunter Killer (2018) [BluRay] [1080p] [YTS.AM]" from the IP address 73.153.233.238 of [REDACTED] on 1/29/2019 via a BitTorrent Client.

5. Without admitting liability, I used a BitTorrent Client to download and share copies of the above motion pictures. I did so without knowing that the torrent files provided by the YTS website were illegal.


20-022C 1:20-cv-2842

6. Counsel for Plaintiffs has informed me that their agent sent at least 2 infringement notices to [REDACTED] between January and December of 2019 regarding confirmed infringements of the above motion pictures. I did not receive any copies of these notices or any warnings from [REDACTED].

7. I would have immediately stopped using the BitTorrent Client had I received any termination warnings or copies of the infringement notices from [REDACTED].

I declare under penalty of perjury that the foregoing is true and correct.

DATED: November 3rd, 2020.


STEPHEN MOODY
Westminster, CO